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21 *Attorneys for Plaintiff and the Proposed Class*

22 Additional counsel on signature page

23  
24 UNITED STATES DISTRICT COURT  
25  
26 NORTHERN DISTRICT OF CALIFORNIA  
27  
28 OAKLAND DIVISION

29  
30 **JANE DOE**, individually and on behalf of all  
31 others similarly situated,

32 Plaintiffs,

33 v.

34 **YOUTUBE, INC.**

35 Defendant.

36 Case No. 4:20-CV-7493-YGR

37  
38 **JOINT STIPULATED REQUEST AND  
39 [PROPOSED] ORDER TO EXTEND TIME TO  
40 FILE AMENDED COMPLAINT**

1        This Stipulation is entered between Plaintiff Jane Doe (“Plaintiff”); and YouTube, LLC  
2 (“Defendant”), by and through their respective counsel.

3        WHEREAS, Plaintiff Jane Doe, on behalf of herself and all others similarly situated, filed the  
4 above captioned action on September 21, 2020, in the Superior Court of California, County of San  
5 Mateo;

6        WHEREAS, Defendant YouTube, Inc., removed the above captioned action to this Court on  
7 October 24, 2020;

8        WHEREAS, Plaintiff agreed to extend the deadline for Defendant to respond to Plaintiff’s  
9 Complaint until December 2, 2020 (ECF No. 6);

10      WHEREAS, Defendant filed a motion to dismiss on December 2, 2020 (ECF No. 16);

11      WHEREAS, the parties stipulated to a revised briefing schedule on December 11, 2020 (ECF  
12 No. 22), which was entered by the Court on December 15, 2020 (ECF No. 23);

13      WHEREAS, on July 13, 2021, this Court heard oral argument on Defendant’s motion to  
14 dismiss;

15      WHEREAS, on July 14, 2021, the Court granted Defendant’s motion to dismiss with leave to  
16 amend and ordered Plaintiff to file her amended complaint by no later than August 13, 2021 (ECF No.  
17 32);

18      WHEREAS, since entry of the Court’s July 14, 2021 order, the parties have conferred through  
19 their counsel of record and agree that they would like an opportunity to discuss potential resolution  
20 informally;

21      IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff and Defendant, as  
22 represented by their undersigned counsel, subject to the approval of the Court, the last date by which  
23 Plaintiff shall file an Amended Complaint be extended to October 15, 2021.

1 Respectfully submitted,

2 Dated: August 11, 2021

3 By: /s/ Zachary M. Briers

4 Zachary M. Briers (SBN 287984)

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21 *Counsel for Plaintiff and the Proposed Class*

22 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

23 Dated: August \_\_, 2021

24 \_\_\_\_\_  
25 HONORABLE YVONNE GONZALEZ ROGERS  
26 UNITED STATES DISTRICT JUDGE  
27  
28

N.D. Cal. Civil Local Rule 5-1 Attestation

I, Steven N. Williams, am the ECF user whose credentials were utilized in the electronic filing of this document. In accordance with N.D. Cal. Civil Local Rule 5-1(i)(3), I hereby attest that Zachary M. Briers concurred in the filing of this document.

By: *Steven N. Williams*  
Steven N. Williams